

Filing # 143577154 E-Filed 02/09/2022 11:01:10 AM

IN THE CIRCUIT COURT OF THE 11th
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

CASE NO.:

VINNIE PIANTINI, an individual,

Plaintiff,

v.

BATH & BODY WORKS, LLC, a foreign
for-profit corporation,

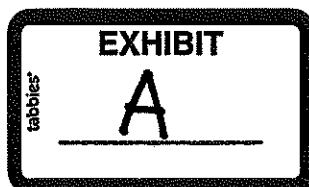
Defendant.

_____ /

COMPLAINT FOR DAMAGES

COMES NOW the Plaintiff, VINNIE PIANTINI, by and through the undersigned counsel and hereby sues the Defendant, BATH & BODY WORKS, LLC, a foreign for-profit corporation (hereinafter referred to as "BATH AND BODY"), and pursuant to all applicable Florida Rules of Civil Procedure hereby alleges the following:

1. This is an action for damages in excess of Thirty Thousand Dollars (\$30,000.00), excluding costs, interest, and attorney's fees.
2. The Plaintiff, VINNIE PIANTINI, was and is a resident of Miami-Dade County and is otherwise sui juris.
3. All incidents described in this Complaint occurred in Miami-Dade County, Florida.
4. The Defendant, BATH AND BODY, exists, and operates under the laws of the State of Florida.



5. The Defendant, BATH AND BODY, owned, occupied and/or controlled the store, Bath and Body Works, specifically store number 82456 located at 13630 Southwest 120th Street, Miami, Florida 33186 (hereinafter referred to as the “subject premises”).

6. The Defendant, BATH AND BODY, had control of all of the subject premises, including but not limited to the sidewalk/walkway immediately outside of the front door.

7. On or about November 23, 2020, the Defendant, BATH AND BODY, placed a metal sign immediately outside the entrance to the subject store.

8. On or about November 23, 2020, the Plaintiff, VINNIE PIANTINI, was an invitee at the subject premises, owned, operated, and maintained by the Defendant, BATH AND BODY.

9. On or about the above date, the Plaintiff, VINNIE PIANTINI, was standing in line to enter the subject store. While the Plaintiff, VINNIE PIANTINI, was standing in line, the metal sign immediately outside the front door of the store entrance fell and struck the Plaintiff’s body, thereby causing severe and permanent injuries.

COUNT I:
NEGLIGENCE AS TO DEFENDANT, BATH & BODY WORKS, LLC.

Plaintiff realleges paragraphs one through nine as if fully set forth herein.

10. The Defendant, BATH AND BODY, had a non-delegable duty to the Plaintiff, VINNIE PIANTINI, as its invitee, to maintain its premises in a reasonably safe condition, and to protect or warn the Plaintiff, VINNIE PIANTINI, from the unsecured metal sign outside the front door of the subject store entrance which the Defendant, BATH AND BODY, was or should have been aware, through the use of ordinary and reasonable care.

11. The Defendant, BATH AND BODY, breached its duty to Plaintiff, VINNIE PIANTINI, by committing one or more of the following acts or omissions:

- a) Negligently failing to adequately secure the metal sign from which it was reasonably foreseeable that it would fall and strike persons such as Plaintiff and cause injury;
- b) Negligently failing to inspect or adequately inspect the metal sign to discover the hazardous condition described above;
- c) Negligently allowing the hazardous condition described above to remain on the premises despite knowledge of the potential harm it presented to persons such as Plaintiff;
- d) Negligently failing to maintain or adequately maintain the unsecure metal sign, thus creating a hazardous condition to guests such as Plaintiff utilizing said premises;
- e) Negligently failing to warn of the unsecure metal sign on its premises from which it was reasonably foreseeable that persons such as Plaintiff would suffer injury;
- f) Negligently failing to barricade, restrict, or otherwise prevent persons such as Plaintiff from encountering the unsecure metal sign on its premises as described above;
- g) Negligently failing to maintain the subject property in compliance with applicable building codes and/or industry standards; and
- h) Negligently failing to use due care under all relevant surrounding circumstances.

12. As a direct result of the Defendant's negligence, the Plaintiff, VINNIE PIANTINI, suffered permanent losses, including but not limited to bodily injury resulting in pain, suffering, disability, disfigurement, mental anguish, emotional distress, loss of capacity for the enjoyment of life, expenses of hospitalization, medical and nursing care and treatment, and aggravation or acceleration of pre-existing injury, loss of earnings, loss of ability to earn money and loss of personal property. These losses are either permanent or continuing in nature and the Plaintiff will suffer these losses in the future.

WHEREFORE, the Plaintiff, VINNIE PIANTINI, prays for entry of a Judgment against the Defendant, BATH AND BODY, in an amount in excess of Thirty Thousand Dollars (\$30,000.00), plus costs, and the Plaintiff further demands trial by jury of all issues in this cause so triable as a matter of right.

DATED in Miami-Dade County, Florida this **9th day of February, 2022.**

AIGEN LAW FIRM, P.A
SunTrust International Center
1 SE 3rd Avenue
Suite 3020
Miami, Florida 33131
(305) 533-1600 phone
(305) 938-5029 fax

/s/ Scott M. Aigen
Scott M. Aigen, Esq.
Florida Bar #51881

SMA/AK

IN THE CIRCUIT COURT OF THE 11th
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

CASE NO.: 2022-002472-CA-01

VINNIE PIANTINI, an individual,

Plaintiff,

v.

BATH & BODY WORKS, LLC, a foreign
for-profit corporation,

Defendant.

**PLAINTIFF'S NOTICE OF FILING INITIAL INTERROGATORIES
TO DEFENDANT, BATH & BODY WORKS, LLC**

The Plaintiff, VINNIE PIANTINI, by and through the undersigned attorney, propounds the attached set of Interrogatories numbered one (1) through twenty-nine (29) to the Defendant, BATH & BODY WORKS, LLC, to be answered in writing, under oath, or objected to within forty-five (45) days pursuant to Rule 1.340 of the Florida Rules of Civil Procedure.

WE HEREBY CERTIFY that a true and correct copy of the foregoing served along with the lawsuit in this matter, upon the Defendant, BATH & BODY WORKS, LLC.

AIGEN LAW FIRM, P.A
SunTrust International Center
1 SE 3rd Avenue
Suite 3020
Miami, Florida 33131
(305) 533-1600 phone
(305) 938-5029 fax

/s/ Scott Aigen
Scott M. Aigen, Esq.
Florida Bar #51881

SMA/AK

PLAINTIFF'S INITIAL INTERROGATORIES
TO DEFENDANT, BATH & BODY WORKS, LLC

1. What is the name and address of the person answering these interrogatories, and if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?
2. Describe any and all policies of insurance which you contend cover or may cover you for the allegations set forth in plaintiff's complaint, detailing as to such policies the name of the insurer, the number of the policy, the effective dates of the policy, the available limits of liability, and the name and address of the custodian of the policy.
3. Describe in detail how the incident described in the complaint happened, including all actions taken by you to prevent the incident.
4. Describe in detail each act or omission on the part of any party to this lawsuit that you contend constituted negligence that was a contributing legal cause of the incident in question.
5. State the facts upon which you rely for each affirmative defense in your answer.
6. Do you contend any person or entity other than you is, or may be, liable in whole or part for the claims asserted against you in this lawsuit? If so, state the full name and address of each such person or entity, the legal basis for your contention, the facts or evidence upon which your contention is based, and whether or not you have notified each such person or entity of your contention.

7. List the names and addresses of all persons who are believed or known by you, your agents, or your attorneys to have any knowledge concerning any of the issues in this lawsuit; and specify the subject matter about which the witness has knowledge.
8. Have you heard or do you know about any statement or remark made by or on behalf of any party to this lawsuit, other than yourself, concerning any issue in this lawsuit? If so, state the name and address of each person who made the statement or statements, the name and address of each person who heard it, and the date, time, place, and substance of each statement.
9. State the name and address of every person known to you, your agents, or your attorneys who has knowledge about, or possession, custody, or control of, any model, plat, map, drawing, motion picture, videotape, or photograph pertaining to any fact or issue involved in this controversy; and describe as to each, what item such person has, the name and address of the person who took or prepared it, and the date it was taken or prepared.
10. Do you intend to call any expert witnesses at the trial of this case? If so, state as to each such witness the name and business address of the witness, the witness' qualifications as an expert, the subject matter upon which the witness is expected to testify, the substance of the facts and opinions to which the witness is expected to testify, and a summary of the grounds for each opinion.
11. Have you made an agreement with anyone that would limit that party's liability to anyone for any of the damages sued upon in this case? If so, state the terms of the agreement and the parties to it.

12. List the names and addresses of all employees, agents, or independent contractors of the Defendant who were responsible for placing store signs outside of the subject store (as described in the Complaint) of the Bath and Body Works on November 23, 2020, and the three (3) years prior thereto.
13. List the name and address of the employee, agent, or independent contractor of the Defendant who placed the subject store sign outside of the subject store (as described in the Complaint) of the Bath and Body Works on the date of November 23, 2020.
14. State the name and address of the store manager of the subject Bath and Body Works on November 23, 2020. Was the store manager physically present on the store premises on November 23, 2020?
15. Please indicate whether or not any markings or warning signs were placed in the area in which the Plaintiff was injured indicating that there existed a dangerous or hazardous condition. If so, please describe the markings or signs in detail and list their location in the area as well as their proximity as to where the Plaintiff fell.
16. Please state the title of any manual or other such document that discusses the policy and procedures to be followed by the Defendant and its employees, servants, and/or agents, for securing store signs substantially similar to the subject sign depicted in Exhibit "A" at the subject Bath and Body Works.

17. Please state the policies and procedures of the subject Bath & Body Works in effect on November 23, 2020, for securing and/or fastening store signs substantially similar to the store sign depicted in the attached exhibit "A".

18. Please state whether any claims have been made against the Defendant as a result of any injury on the premises due to unsecured metal signs of the Bath and Body Works in the three (3) years prior to November 23, 2020. If yes, please state the following:
 - A. A brief description of the incident.

 - B. The names and addresses of the persons who were involved.

 - C. The dates of the incident.

 - D. Description of how the claim was resolved. If a lawsuit was filed, please state the name of the Plaintiff, the case number, and the county in which the suit was filed.

19. Regarding your investigation of the subject incident, please state the following:
 - A. The names and addresses of all persons who investigated the cause and circumstances of the occurrence for you or your insurance carrier.

 - B. The names and addresses of all persons who have investigated Plaintiffs' alleged injuries and damages for you or your insurance carrier.

- C. The names and addresses of all persons who have given you signed statements concerning the incident.
 - D. The names and addresses of any persons who prepared any reports regarding the Plaintiff's incident, which were made in the ordinary course of business.
20. Please state what precautions, if any, were used by the Defendant on November 23, 2020, to prevent injuries from falling store signs at the subject store. Identify by name, title, addresses and phone numbers those persons who engaged in such precautions.
21. Was close circuit television and/or video footage available at the facility on the day of the Plaintiff's injury? If yes, describe as to where the videotapes were at the time of the Plaintiff's accident, where they are currently stored, and by whom.
22. Please state the exact date(s) as to when the store sign (as depicted in Exhibit "A") in the subject Bath and Body Works had been repaired, modified, and in any way maintained in the three (3) years prior to November 23, 2020.
23. Please state whether the store sign (as depicted in Exhibit "A") of the subject Bath and Body Works was inspected for safety by an employee, contractor, insurance company, government agency, and/or other person or entity in the three (3) years prior to November 23, 2020. If yes, please state the following:
- A. The names and addresses of all persons or entities who performed an inspection;
 - B. The date(s) as to when the inspection was performed

24. On the day of the subject incident, November 23, 2020, state each and every time that the subject store signs (as depicted in the attached Exhibit "A") of the subject Bath and Body Works had been inspected, examined, or otherwise checked for safety and/or instability.
25. Were any recommendations made at any time before or after the subject accident by an insurance company, governmental agency, or other entity regarding the implementation of any type of safety precautions designed to prevent injury from falling store signs substantially similar to the store sign depicted in the attached exhibit "A" on the Defendant's premises? If yes, state with specific the recommendation(s) that was made along with the name and address of any and all persons and/or entities that made them.
26. State the weight of the sign attached hereto as exhibit "A".
27. State the material(s) of the sign attached hereto as exhibit "A".
28. Provide the current location of the sign attached hereto as exhibit "A".
29. State the name and address of the employee, agent, or contractor, who placed the sign outside of Bath & Body Works on November 23, 2020, as depicted in Exhibit "A".

JURAT PAGE

STATE OF _____
COUNTY OF _____

_____ AFFIANT

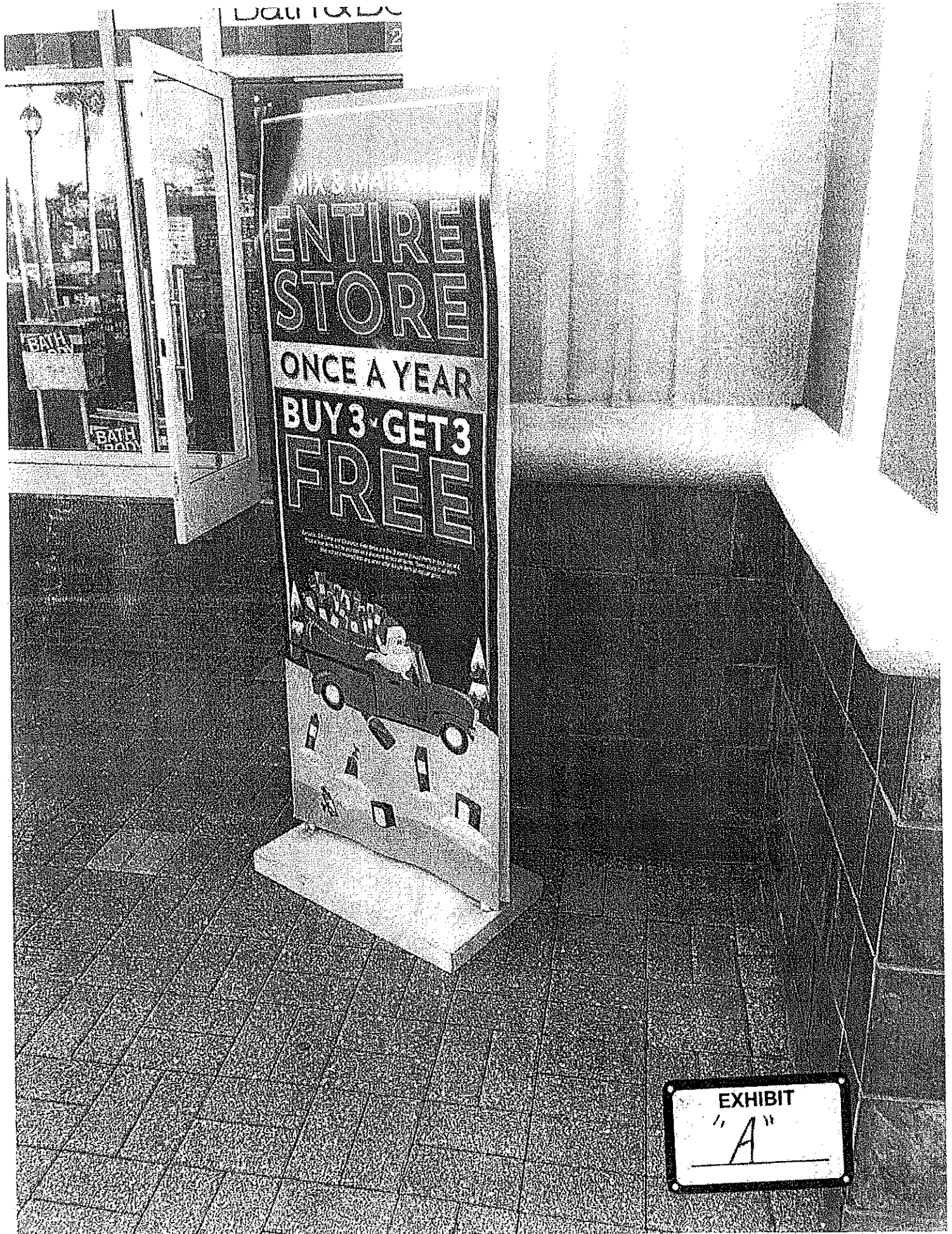
SS

BEFORE ME, the undersigned authority, personally appeared, _____, who is personally known to me to be the person described and/or produced _____ as identification and who executed the foregoing instrument and before me acknowledged his/her execution of same.

WITNESS my hand and official seal in the County and State last aforesaid, this _____ day of _____.

NOTARY PUBLIC

My Commission Expires:



IN THE CIRCUIT COURT OF THE 11th
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

CASE NO.: 2022-002472-CA-01

VINNIE PIANTINI, an individual,

Plaintiff,

v.

BATH & BODY WORKS, LLC, a foreign
for-profit corporation,

Defendant.

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION
TO DEFENDANT, BATH & BODY WORKS, LLC

The Plaintiff, VINNIE PIANTINI, by and through the undersigned attorney, propounds the attached First Request for Production pursuant to Rule 1.350 of the Florida Rules of Civil Procedure, and requests the Defendant, BATH & BODY WORKS, LLC, to produce and permit the inspection and copying of the following documents within forty-five (45) days from the date of service at the undersigned counsel's office:

1. All communications in written form between the Plaintiff and the Defendant.
2. All photographs of the accident scene.
3. All video tapes of the accident scene.
4. All photographs of the Plaintiff.
5. All video tapes of the Plaintiff.
6. All audio tapes of the Plaintiff.
7. All written reports in the Defendant's possession regarding the subject accident.

8. All policies and procedure manuals, handouts, videotapes, and audio tapes involving safety, installation, maintenance, care, and/or upkeep of the store sign attached hereto as exhibit "A" of the subject Bath & Body Works.

9. All maintenance records of the store sign attached hereto as exhibit "A" belonging to the subject store, on the date of November 23, 2020, and the previous three (3) years.

10. All written and/or recorded statements of the Plaintiff, employees, and witnesses as related to the Plaintiff's accident.

11. A list of all employees working for the subject Bath & Body Works on the date of November 23, 2020, who witnessed or who have information regarding the subject incident.

12. A list of all injuries stemming from falling store signs substantially similar to the store sign depicted in Exhibit "A" occurring on the premises of the subject Bath & Body Works on November 23, 2020, and for the previous three (3) years and identify by name, address, and phone number of the person(s) injured.

13. Any written materials related to the care and upkeep of store signs substantially similar to the sign depicted in Exhibit "A".

14. Copies of all insurance policies in force at the time of the Plaintiff's accident.

15. Copies of any and all documents produced by any person or entity regarding safety precautions to be implemented on placing store signs at or near the subject Bath & Body Works in the three (3) years prior to November 23, 2020.

16. Copies of any and all invoices for work performed on the store sign attached hereto as Exhibit "A" of the subject Bath & Body Works in the three (3) years prior to November 23, 2020.

17. Copies of any and all invoices for work performed on the store sign attached hereto as Exhibit "A" of the subject Bath & Body Works after November 23, 2020.

18. Copies of any and all repair estimates for work performed on the store sign attached hereto as Exhibit "A" of the subject Bath & Body Works in the three (3) years prior to November 23, 2020.

19. Copies of any and all repair estimates for work performed on the store sign attached hereto as Exhibit "A" of the subject Bath & Body Works after November 23, 2020.

20. Copies of any and all inspection reports pertaining to the store sign attached hereto as Exhibit "A" of the subject Bath & Body Works in the three (3) years prior to November 23, 2020.

21. Copies of any and all inspection reports pertaining to the store sign attached hereto as Exhibit "A" of the subject Bath & Body Works after November 23, 2020.

22. Any written, internal store communications of the subject Bath & Body Works regarding the store sign attached hereto as Exhibit "A" and its placement on November 23, 2020.

23. Any written, internal store communications of the subject Bath & Body Work regarding the store sign attached hereto as Exhibit "A" and its involvement in falling on customer(s) on November 23, 2020.

WE HEREBY CERTIFY that a true and correct copy of the foregoing is served along with the lawsuit in this matter, upon the Defendant, BATH & BODY WORKS, LLC.

AIGEN LAW FIRM, P.A
SunTrust International Center
1 SE 3rd Avenue
Suite 3020
Miami, Florida 33131
(305) 533-1600 phone
(305) 938-5029 fax

/s/ Scott Aigen
Scott M. Aigen, Esq.
Florida Bar #51881

SMA/AK



Filing # 143667043 E-Filed 02/10/2022 11:03:02 AM

IN THE CIRCUIT COURT OF THE 11th
JUDICIAL CIRCUIT IN AND FOR MIAMI-
DADE COUNTY, FLORIDA

CASE NO.: 2022-002472-CA-01

VINNIE PIANTINI, an individual,

Plaintiff,

v.

BATH & BODY WORKS, LLC, a foreign
for-profit corporation,

Defendant.

CIVIL ACTION SUMMONS
CORPORATE SERVICE

TO: BATH & BODY WORKS, LLC, a foreign for-profit corporation,

BY SERVING: C T CORPORATION SYSTEM
1200 South Pine Island Road
Plantation, Florida 33324

IMPORTANT

A lawsuit (Complaint with attached Interrogatories and Request for Production), including has been filed against you. You have 20 calendar days after this summons is served on you to file a written response to the attached complaint/petition with the clerk of this court. A phone call will not protect you. Your written response, including the case number given above and the names of the parties, must be filed if you want the court to hear your side of the case. If you do not file your written response on time, you may lose the case, and your wages, money, and property may thereafter be taken without further warning from the court. There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may call an attorney referral service or a legal aid office (listed in the phone book).

If you choose to file a written response yourself, at the same time you file your written response to the court you must also mail or take a copy of your written response to the "Plaintiff/Plaintiff's Attorney" named below.

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IMPORTANTE

Usted ha sido demandado legalmente. Tiene veinte (20) días, contados a partir del recibo de esta notificación, para contestar la demanda adjunta, por escrito, y presentarla ante este tribunal. Una llamada telefónica no lo protegerá. Si usted desea que el tribunal considere su defensa, debe presentar su respuesta por escrito, incluyendo el número del caso y los nombres de las partes interesadas. Si usted no contesta la demanda a tiempo, pudiese perder el caso y podría ser despojado de sus ingresos y propiedades, o privado de sus derechos, sin previo aviso del tribunal. Existen otros requisitos legales. Si lo desea, usted puede consultar a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a una de las oficinas de asistencia legal que aparecen en la guía telefónica.

Si desea responder a la demanda por su cuenta, al mismo tiempo en que presenta su respuesta ante el tribunal, deberá usted enviar por correo o entregar una copia de su respuesta a la persona denominada abajo como "Plaintiff/Plaintiff's Attorney" (Demandante o Abogado del Demandante).

AVISO: La regla 12.285, de las reglas de procedimiento del derecho de la familia del estado de la Florida exige que se entreguen ciertos datos y documentos a la parte adversa...So Ud. no cumple con estos requisitos, se le podran aplicar sanciones, las cuales pueden dar lugar al rechazo o a la desestimacion de sus escritos.

IMPORTANT

Des poursuites judiciaires ont été entreprises contre vous. Vous avez 20 jours consécutifs à partir de la date de l'assignation de cette citation pour déposer une réponse écrite à la plainte ci-jointe auprès de ce tribunal. Un simple coup de téléphone est insuffisant pour vous protéger; vous êtes obligés de déposer votre réponse écrite, avec mention du numéro de dossier ci-dessus et du nom des parties nommées ici, si vous souhaitez que le tribunal entende votre cause. Si vous ne déposez pas votre réponse écrite dans le délai requis, vous risquez de perdre la cause ainsi que votre salaire, votre argent, et vos biens peuvent être saisis par la suite, sans aucun préavis ultérieur du tribunal. Il y a d'autres obligations juridiques et vous pouvez requérir les services immédiats d'un avocat. Si vous ne connaissez pas d'avocat, vous pourriez téléphoner à un service de référence d'avocats ou à un bureau d'assistance juridique (figurant à l'annuaire de téléphones).

Si vous choisissez de déposer vous-même une réponse écrite, il vous faudra également, en même temps que cette formalité, faire parvenir ou expédier une copie au carbone ou une photocopie de votre réponse écrite à la personne nommée ci-dessous.

ATTENTION: La règle 12.285 des règles de procédure du droit de la famille de la Floride exige que l'on remette certains renseignements et certains documents à la partie adverse. Tout refus de les fournir pourra donner lieu à des sanctions, y compris le rejet ou la suppression d'un ou de plusieurs actes de procédure.

AIGEN LAW FIRM, P.A

Scott M. Aigen, Esq.

Counsel for Plaintiff

SunTrust International Center

1 SE 3rd Avenue

Suite 3020

Miami, Florida 33131

THE STATE OF FLORIDA

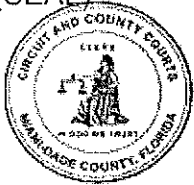
TO EACH SHERIFF OF THE STATE:

You are commanded to serve this summons and a copy of the complaint in this lawsuit on the above named defendant.

DATED on this _____ day of _____, 2022.

2/14/2022

(SEAL)



CLERK OF CIRCUIT COURT

HARVEY RUVIN

As Clerk of the Court

217043

By: _____

Avon Bethel

Deputy Clerk

Filing # 143577154 E-Filed 02/09/2022 11:01:10 AM

FORM 1.997. CIVIL COVER SHEET

The civil cover sheet and the information contained in it neither replace nor supplement the filing and service of pleadings or other documents as required by law. This form must be filed by the plaintiff or petitioner with the Clerk of Court for the purpose of reporting uniform data pursuant to section 25.075, Florida Statutes. (See instructions for completion.)

I. CASE STYLE

IN THE CIRCUIT/COUNTY COURT OF THE ELEVENTH JUDICIAL CIRCUIT,
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

VINNIE PIANTINI

Plaintiff

Case # _____

Judge _____

vs.

BATH AND BODYWORKS, LLC

Defendant

II. AMOUNT OF CLAIM

Please indicate the estimated amount of the claim, rounded to the nearest dollar. The estimated amount of the claim is requested for data collection and clerical processing purposes only. The amount of the claim shall not be used for any other purpose.

- ☐ \$8,000 or less
☐ \$8,001 - \$30,000
☐ \$30,001 - \$50,000
☐ \$50,001 - \$75,000
☐ \$75,001 - \$100,000
☒ over \$100,000.00

III. TYPE OF CASE (If the case fits more than one type of case, select the most definitive category.) If the most descriptive label is a subcategory (is indented under a broader category), place an x on both the main category and subcategory lines.

CIRCUIT CIVIL

- ☐ Condominium
- ☐ Contracts and indebtedness
- ☐ Eminent domain
- ☐ Auto negligence
- ☒ Negligence—other
 - ☐ Business governance
 - ☐ Business torts
 - ☐ Environmental/Toxic tort
 - ☐ Third party indemnification
 - ☐ Construction defect
 - ☐ Mass tort
 - ☐ Negligent security
 - ☐ Nursing home negligence
 - ☒ Premises liability—commercial
 - ☐ Premises liability—residential
- ☐ Products liability
- ☐ Real Property/Mortgage foreclosure
 - ☐ Commercial foreclosure
 - ☐ Homestead residential foreclosure
 - ☐ Non-homestead residential foreclosure
 - ☐ Other real property actions
- ☐ Professional malpractice
 - ☐ Malpractice—business
 - ☐ Malpractice—medical
 - ☐ Malpractice—other professional
- ☐ Other
 - ☐ Antitrust/Trade regulation
 - ☐ Business transactions
 - ☐ Constitutional challenge—statute or ordinance
 - ☐ Constitutional challenge—proposed amendment
 - ☐ Corporate trusts
 - ☐ Discrimination—employment or other
 - ☐ Insurance claims
 - ☐ Intellectual property
 - ☐ Libel/Slander
 - ☐ Shareholder derivative action
 - ☐ Securities litigation
 - ☐ Trade secrets
 - ☐ Trust litigation

COUNTY CIVIL

- ☐ Small Claims up to \$8,000
- ☐ Civil
- ☐ Real property/Mortgage foreclosure

- ☐ Replevins
- ☐ Evictions
 - ☐ Residential Evictions
 - ☐ Non-residential Evictions
- ☐ Other civil (non-monetary)

COMPLEX BUSINESS COURT

This action is appropriate for assignment to Complex Business Court as delineated and mandated by the Administrative Order. Yes ☐ No ☒

IV. REMEDIES SOUGHT (check all that apply):

- ☒ Monetary;
- ☐ Nonmonetary declaratory or injunctive relief;
- ☐ Punitive

V. NUMBER OF CAUSES OF ACTION: []
(Specify)

1

VI. IS THIS CASE A CLASS ACTION LAWSUIT?

- ☐ yes
- ☒ no

VII. HAS NOTICE OF ANY KNOWN RELATED CASE BEEN FILED?

- ☒ no
- ☐ yes If "yes," list all related cases by name, case number, and court.

VIII. IS JURY TRIAL DEMANDED IN COMPLAINT?

- ☒ yes
- ☐ no

I CERTIFY that the information I have provided in this cover sheet is accurate to the best of my knowledge and belief, and that I have read and will comply with the requirements of Florida Rule of Judicial Administration 2.425.

Signature: s/ Scott Aigen
Attorney or party

Fla. Bar # 51881
(Bar # if attorney)

Scott Aigen
(type or print name)

02/09/2022
Date